



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION IX  
75 Hawthorne Street  
San Francisco, CA 94105**

December 9, 2014

Ms. Patricia L. Neubacher  
Acting Regional Director, Pacific West Region  
National Park Service  
Lake Mead National Recreation Area  
601 Nevada Way  
Boulder City, Nevada 89005

Subject: Final Environmental Impact Statement for Lake Mead Cottonwood Cove and Katherine Landing Development Conceptual Plans, Clark County, Nevada and Mohave County, Arizona (CEQ# 20140323)

Dear Ms. Neubacher:

The U.S. Environmental Protection Agency has reviewed the Final Environmental Impact Statement for the Lake Mead Cottonwood Cove and Katherine Landing Development Conceptual Plans pursuant to the National Environmental Policy Act, Council on Environmental Quality regulations (40 CFR Parts 1500-1508), and Section 309 of the Clean Air Act.

EPA reviewed the Draft Environmental Impact Statement for the Proposed Project and provided comments on April 12, 2013. We rated the document EC-2, "Environmental Concerns – Insufficient Information" based on concerns regarding potential site-specific project impacts that were not sufficiently analyzed.

EPA understands from our conversation with the National Parks Service Project manager on December 2, 2014 that no site-specific project actions will take place as a result of the EIS. Rather, the Lake Mead Cottonwood Cove and Katherine Landing Development Conceptual Plan is in fact a programmatic EIS. Any projects described in the FEIS would tier from this document at a future date and would require a stand alone NEPA process. If site-specific projects tiered from the above-referenced document would result in significant impacts, then those projects would warrant an individual EIS. We recommend that the ROD clearly describe the programmatic nature of the subject FEIS and how future project-specific NEPA analysis would be tiered from this programmatic EIS.

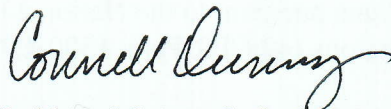
The NPS has identified Alternative 1, the no-action alternative, as the environmentally preferable alternative (Page 58). We understand this is because of the potential adverse impacts of Alternatives 2 and 3, which include site-specific projects for which the environmental consequences are not fully known since design information for these future individual projects has not yet been completed.

We continue to recommend that the NPS integrate sustainable design elements when proposing future projects that will tier from this Programmatic EIS, including: 1) efficient mechanical and electrical systems; 2) recycled or locally produced materials; 3) onsite generation of renewable energy; 4) use of native plants; and 5) techniques to protect dark skies. Further, by committing to environmentally friendly designs and best management practices to protect water and air quality, the NPS may be able to have an environmentally preferable action alternative.

Changing climate conditions are predicted to result in more extreme weather patterns, which will likely both heighten flood risks, and also result in less water, at various times. We recommend the NPS ascertain if lake carrying capacities could undergo alterations from these climate change-related impacts (including extreme weather patterns, hotter temperatures and drought.) Page 199 states: "Methodologies that would allow an evaluation of climate change effects for specific areas are not currently available. Whether climate change would result in more or heightened floods in the two developed areas cannot be accurately predicted based on the existing science." For more information on climate change, please visit the National Climate Assessment website at <http://nca2014.globalchange.gov/>

EPA appreciates the opportunity to review this FEIS. When the ROD is released, please send one hard copy to the address above (mail code: ENF-4-2). If you have any questions, please contact me at (415) 972-3521, or have your staff contact James Munson, the lead reviewer for this project. James can be reached at (415) 972-3852 or [Munson.James@epa.gov](mailto:Munson.James@epa.gov)

Sincerely,

*For* 

Kathleen Martyn Goforth, Manager  
Environmental Review Section



## **SUMMARY OF EPA RATING DEFINITIONS\***

This rating system was developed as a means to summarize the U.S. Environmental Protection Agency's (EPA) level of concern with a proposed action. The ratings are a combination of alphabetical categories for evaluation of the environmental impacts of the proposal and numerical categories for evaluation of the adequacy of the Environmental Impact Statement (EIS).

### **ENVIRONMENTAL IMPACT OF THE ACTION**

#### ***"LO" (Lack of Objections)***

The EPA review has not identified any potential environmental impacts requiring substantive changes to the proposal. The review may have disclosed opportunities for application of mitigation measures that could be accomplished with no more than minor changes to the proposal.

#### ***"EC" (Environmental Concerns)***

The EPA review has identified environmental impacts that should be avoided in order to fully protect the environment. Corrective measures may require changes to the preferred alternative or application of mitigation measures that can reduce the environmental impact. EPA would like to work with the lead agency to reduce these impacts.

#### ***"EO" (Environmental Objections)***

The EPA review has identified significant environmental impacts that should be avoided in order to provide adequate protection for the environment. Corrective measures may require substantial changes to the preferred alternative or consideration of some other project alternative (including the no action alternative or a new alternative). EPA intends to work with the lead agency to reduce these impacts.

#### ***"EU" (Environmentally Unsatisfactory)***

The EPA review has identified adverse environmental impacts that are of sufficient magnitude that they are unsatisfactory from the standpoint of public health or welfare or environmental quality. EPA intends to work with the lead agency to reduce these impacts. If the potentially unsatisfactory impacts are not corrected at the final EIS stage, this proposal will be recommended for referral to the Council on Environmental Quality (CEQ).

### **ADEQUACY OF THE IMPACT STATEMENT**

#### ***Category "1" (Adequate)***

EPA believes the draft EIS adequately sets forth the environmental impact(s) of the preferred alternative and those of the alternatives reasonably available to the project or action. No further analysis or data collection is necessary, but the reviewer may suggest the addition of clarifying language or information.

#### ***Category "2" (Insufficient Information)***

The draft EIS does not contain sufficient information for EPA to fully assess environmental impacts that should be avoided in order to fully protect the environment, or the EPA reviewer has identified new reasonably available alternatives that are within the spectrum of alternatives analyzed in the draft EIS, which could reduce the environmental impacts of the action. The identified additional information, data, analyses, or discussion should be included in the final EIS.

#### ***Category "3" (Inadequate)***

EPA does not believe that the draft EIS adequately assesses potentially significant environmental impacts of the action, or the EPA reviewer has identified new, reasonably available alternatives that are outside of the spectrum of alternatives analyzed in the draft EIS, which should be analyzed in order to reduce the potentially significant environmental impacts. EPA believes that the identified additional information, data, analyses, or discussions are of such a magnitude that they should have full public review at a draft stage. EPA does not believe that the draft EIS is adequate for the purposes of the NEPA and/or Section 309 review, and thus should be formally revised and made available for public comment in a supplemental or revised draft EIS. On the basis of the potential significant impacts involved, this proposal could be a candidate for referral to the CEQ.

\*From EPA Manual 1640, Policy and Procedures for the Review of Federal Actions Impacting the Environment.